REMARKS

Reconsideration and allowance are respectfully requested in light of the above amendments and the following remarks.

Applicants acknowledge with appreciation the indication in the Office Action that claims 9, 10, 17, 23, 24, 29, and 30 are allowed and claims 11-14 and 25-28 define allowable subject matter.

The claims have been amended to overcome the 35 USC 112, second paragraph, rejections, and for clarity.

Claims 1-4, 15 and 16 have been amended to highlight the feature wherein the semiconductor integrated circuit has a contact array between wiring layers. Figs. 9 and 11 support these amendments.

Claims 1-4, 15, and 16 stand rejected under 35 USC §102(b) as anticipated by Nguyen (US 5,477,933). The Applicants respectfully traverse.

Nguyen fails to disclose the feature recited in claims 1-4,

15 and 16 of a semiconductor integrated circuit comprising a

contact array between wiring layers. The claimed integrated

circuit has a plurality of wiring layers, and these wiring layers

are electrically connected to each other by the contacts disposed

between the wiring layers.

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By contrast to the above-noted claimed feature, Nguyen discloses in Fig. 1 a microelectronic chip 11 that is bonded to a first intermediate interconnection member 13 by a first ball grid array 12 and first intermediate interconnection member 13 is bonded to a substrate 25 by a second ball grid array 23. Nguyen's microelectronic chip 11, first intermediate interconnection member 13, and substrate 25 are not wiring layers of a semiconductor integrated circuit. Instead, Nguyen's microelectronic chip 11 comprises a semiconductor integrated circuit and first intermediate interconnection member 13 and substrate 25 are increasingly larger circuit boards for supporting microelectronic chip 11 and providing a more accessible means for interconnecting microelectronic chip 11 with other circuit components. Nguyen's microelectronic chip 11, first intermediate interconnection member 13, and substrate 25 do not constitute wiring layers of a semiconductor integrated circuit.

Accordingly, the Applicants respectfully submit that Nguyen does not anticipate the subject matter defined by claims 1-4, 15 and 16. Specifically, Nguyen does not disclose the feature recited in these claims of a semiconductor integrated circuit comprising a contact array between wiring layers formed in one

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chip. Therefore, allowance of claims 1-4, 15 and 16 and all claims dependent therefrom is warranted.

In view of the above, it is submitted that this application is in condition for allowance and a notice to that effect is respectfully solicited.

If any issues remain which may best be resolved through a telephone communication, the Examiner is requested to telephone the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,

Date: June 16, 2005

JEL/DWW/att

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